

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

ALEXANDRIA DIVISION

IN RE:
NONJUDICIAL CIVIL FORFEITURE
PROCEEDING

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**STIPULATION AND ORDER EXTENDING UNITED STATES'
TIME TO FILE COMPLAINT FOR FORFEITURE AND/OR
OBTAIN INDICTMENT ALLEGING FORFEITURE**

It is hereby stipulated by and between the United States of America and Sonja Miles, by and through their respective attorneys, as follows:

1. On January 23, 2017, claimant Sonja Miles filed a claim, in administrative forfeiture proceedings, with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) with respect to the following (the "property") seized on October 25, 2016: a Remington model 870 shotgun, bearing Serial Number V408898V; a Glock model 23 pistol, bearing Serial Number BBY351; a Glock model 23 Gen 4 pistol, bearing Serial Number TFP756; a Colt model Light Carbine rifle, bearing Serial Number VL004012; a Sig Sauer model 1911 pistol, bearing Serial Number 54A036980; a Sig Sauer model P226 pistol, bearing Serial Number U882396; a Bushmaster Firearms model XM15-E2S rifle, bearing Serial Number L2016835; an Advanced Armament Corp. model Evolution 9mm silencer, bearing Serial Number E9-3628; and 1302 assorted rounds of ammunition.

2. The ATF sent written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties, the time has expired for any person to file a claim to the property under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than Sonja Miles has filed a claim to the property as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the property and/or to obtain an indictment alleging that the property is subject to forfeiture within 90 days after a claim has been filed in the administrative forfeiture proceedings, which in this case would be April 24, 2017, unless the court extends the deadline for good cause shown or by agreement of the parties.

4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend the time in which the United States is required to file a complaint for forfeiture against the property and/or to obtain an indictment alleging that the property is subject to forfeiture, in order that the parties may have a reasonable and sufficient period in which to evaluate their respective interests in and positions regarding the property.

5. Claimant knowingly, intelligently, and voluntarily gives up any right she may have under 18 U.S.C. § 983(a)(3)(A)-(C) to require the United States to file a complaint for forfeiture against the property and/or to obtain an indictment alleging that the property is subject to forfeiture by April 24, 2017, and any right she may have to seek dismissal of any complaint and/or any forfeiture allegation in an indictment on the ground that it was not filed or returned on or before such date.

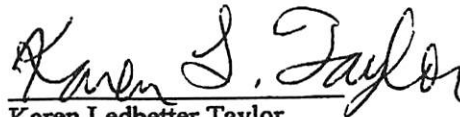
6. The parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the property and/or to obtain an indictment alleging that the property is subject to forfeiture shall be extended from April 24, 2017, to June 30, 2017. Any further extension shall be by agreement of the parties and in writing.

7. Claimant agrees that, until the United States files a complaint for forfeiture against the property and/or obtains an indictment alleging that the property is subject to forfeiture, or June 30,

2017, unless this deadline is later extend, whichever occurs first, the property shall remain in the custody of the United States and claimant shall not seek its return for any reason in any manner.

Date: April __, 2017

Dana J. Boente
United States Attorney



Karen Ledbetter Taylor
Assistant United States Attorney


Date: April 17, 2017



Sonja Miles

IT IS SO ORDERED.

Date: April 18, 2017

/s/ 
Leonie M. Brinkema
United States District Judge